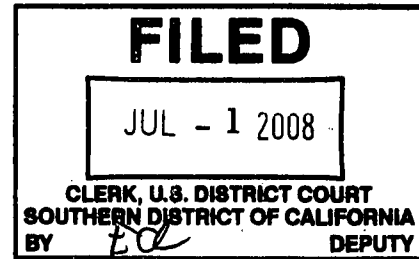


1 AVILA & PEROS, LLP  
2 Michael F. Avila, Esq. SBN: 158958  
[Email: mfa@a-plaw.com]  
3 Daniel A. De Soto, Esq. SBN: 205861  
4 [Email: dad@a-plaw.com]  
2101 Rosecrans Ave., Suite 5260  
5 El Segundo, CA 90245  
6 Telephone: (310) 410-8001  
Facsimile: (310) 410-8004  
7



8 Attorneys for Plaintiffs

9 **UNITED STATES DISTRICT COURT**  
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 '08 CV 1214 JM BLM

12 VENUS ANGELIQUE HISAW )

Case No.:

13 Plaintiff, )

COMPLAINT FOR:

14 vs. )

(1) Negligence

(2) Premises Liability

15 UNITED STATES; and DOES 1-100, )  
16 inclusive, )  
17 )

(3) Deprivation of Civil Rights (42 U.S.C. §1983)

18 Defendants. )  
19 )  
20 )

(4) Wrongful Death Pursuant to California Code of Civil Procedure § 377.60, et al.

21 DEMAND FOR JURY TRIAL

(F.R.Civ. Pro. Rule 38 & S.D. Cal. L.R. 38.1)  
22 )  
23 )  
24 )

25 COMES NOW Plaintiff VENUS ANGELIQUE HISAW (hereinafter "Plaintiff")  
26 and hereby set forth the following allegations and causes of action against Defendant,  
27 UNITED STATES of America, Acting by and Through The Department of the Interior,  
28 Bureau of Land Management; and DOES 1 to 100, inclusive:

I.

**INTRODUCTION**

1. This matter arises out of the death of Kyle Przysiecki, a 15 year old minor, who was killed in a vehicle accident with Shannon Duane Eifert on the Imperial Sand Dunes Recreational Area (hereinafter "ISDRA"), a property owned by the defendant UNITED STATES OF AMERICA (hereinafter "UNITED STATES"), and/or DOES 1-25, on December 25, 2005 (the "Incident"). Plaintiff is VENUS ANGELIQUE HISAW, an individual who is the mother of decedent Kyle Przysiecki. Defendant UNITED STATES acted at relevant times by and through The Department of the Interior's sub-division, the Bureau of Land Management (BLM), and waived its immunity pursuant to the Federal Tort Claim Act. Plaintiff alleges herein several causes of action based upon alternative theories of liability based upon the facts and circumstances surrounding the Incident as currently known and/or believed to be true, and reserve the right to amend this Complaint if and/or when any additional facts are discovered giving rise to new/additional causes of action.

II.

**JURISDICTION and VENUE**

2. The claims made herein are asserted pursuant to the United States Constitution, the Federal Tort Claims Act and 42 U.S.C. §§ 1983 and 1988, 28 U.S.C. §§ 1346, 2671-2680 Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 1331 (federal question), and pendant jurisdiction.

3. Venue is proper pursuant to 28 U.S.C. §1391, as the acts complained of herein occurred in the Southern District of California.

III.

**THE PARTIES**

4. At all times relevant hereto, VENUS ANGELIQUE HISAW, was a resident of the City of Orange, County of Orange, State of California.

5. Based upon information and belief, at all times relevant hereto, Defendant

1 UNITED STATES acted by and through the Bureau of Land Management (hereinafter  
2 "BLM"), a political subdivision of The Department of the Interior, duly organized and  
3 existing under the laws of the UNITED STATES of America.

4 6. The true names and capacities, whether individual, plural, corporate,  
5 partnership, associate, or otherwise, of DOES 1-100, are unknown to Plaintiffs who  
6 therefore sue said Defendants by such fictitious names. The full extent of the facts linking  
7 such fictitiously sued Defendants are unknown to Plaintiff. Plaintiff is informed and  
8 believes, and thereupon alleges, that each of the Defendants designated herein as a DOE  
9 was negligent, participated, authorized and/or ratified the intentional conduct alleged  
10 herein, or in some actionable manner, is responsible for the events and happenings  
11 hereinafter complained of, and thereby legally causing the hereinafter described injuries  
12 and damages to Plaintiffs. Plaintiffs will hereafter seek leave of the Court to amend this  
13 Complaint to show the Defendants' true names and capacities after the same have been  
14 ascertained.

15 7. Plaintiffs are informed and believe, and thereupon allege, that at all times  
16 mentioned herein, Defendants, and each of them, including DOES 1 through 100,  
17 inclusive, and each of them, were agents, servants, employees, successors in interest,  
18 and/or joint venturers of their Co-Defendants, and were, as such, acting within the course,  
19 scope, and authority of said agency, employment, and/or venture, and that each and every  
20 Defendant, as aforesaid, while acting as a principal, was negligent in the selection and  
21 hiring of each and every other Defendant and/or authorized or ratified the wrongful  
22 conduct of each and every other Defendant.

23 IV.

24 **GENERAL ALLEGATIONS**

25 (Alleged by Plaintiffs against All Defendants,  
26 and DOES 1-100, Inclusive)

27 8. Plaintiff hereby incorporate by this reference as if fully set forth herein, each  
28 and every allegation set forth in each and every averment of the preceding Paragraphs 1

1 through 7 above of this Complaint.

2 9. The subject accident of this lawsuit occurred at approximately 1:00 a.m. on  
3 Christmas Day, December 25, 2005, when the son of Plaintiff, Kyle Przysiecki, was  
4 operating a 2003 Honda CRF 450 motorbike in the ISDRA. Shannon Eifert was  
5 operating his 500 Horsepower 2004 Buckshot Sand Rail after leaving his campsite and  
6 was traveling towards SR-78, which was approximately two (2) miles north of the scene  
7 of the subject accident. Eifert drove down a hill and into a flat area full of shrubs prior to  
8 a perpendicular sand highway. Eifert's Sand Rail proceeded to collide with the Honda  
9 CRF 450 causing Plaintiff's son to fall off the dirt bike and to sustain fatal injuries.

10 10. The property where the subject accident occurred is owned by the UNITED  
11 STATES, which, acting by and through The Department of the Interior, Bureau of Land  
12 Management, delegated the authority to administer the ISDRA. Within the ISDRA is a  
13 "fee area" that is designated by the BLM for use of off-road vehicles, including but not  
14 limited to dirt bikes and sand rails. In order to operate an off-road vehicle at ISDRA an  
15 individual must provide the BLM, with consideration in the form of fees as well as  
16 receive a permit.

17 11. Based upon information and belief, at all times relevant hereto, Defendant  
18 UNITED STATES, acting by and through the Department of the Interior's subdivision,  
19 the Bureau of Land Management, contracted with California Highway Patrol, (hereinafter  
20 "CHP"), Imperial County Sheriff's Department (hereinafter "Sheriff's Department"),  
21 County of Imperial (hereinafter "Imperial County"), and California Department of Parks  
22 and Recreation ("CDPR") and Does 41-80 to provide services to ISDRA.

23 12. On or about December 19, 2007, Plaintiff VENUS ANGELIQUE HISAW  
24 presented claims regarding the Incident to BLM for \$25,000,000.00 pursuant to the  
25 Federal Tort Claims Act and 43 CFR §22 and all pertinent code sections, statutes and laws  
26 of The UNITED STATES. The United States failed to make a final disposition of the  
27 claim within six months of the filing of the claim.

28 ///

V.

**FIRST CLAIM FOR RELIEF****(Negligence as Against All Defendants, DOES 1-100, Inclusive)**

13. Plaintiffs hereby incorporate by this reference as if fully set forth herein, each and every allegation set forth in each and every averment of the preceding Paragraphs 1 through 12 above of this Complaint.

14. On December 25, 2005, Shannon Duane Eifert was driving his Sand Rail down a hill and into a flat area full of shrubs causing the Sand Rail to strike a Honda CRF 450 driven by Kyle Przysiecki. As a result of the collision Kyle Przysiecki, the son of plaintiff VENUS ANGELIQUE HISAW sustained fatal injuries.

15. Based upon information and belief, at all times relevant hereto, Defendant UNITED STATES, acting by and through the Department of the Interior, Bureau of Land Management, contracted with the CHP, Sheriff's Department, Imperial County, CDPR, and Does 41-80 to provide services for the safety of the public at ISDRA.

16. Defendants UNITED STATES and Does 1-40 (hereinafter "DEFENDANTS") possessed actual and constructive awareness of the dramatic increase in visitors to ISDRA over the ten (10) years preceding the subject accident. Furthermore, DEFENDANTS possessed actual and constructive awareness that during holiday periods and weekends the population entering the ISDRA sharply increased with up to 200,000 visitors, overnight causing mini-cities to form with little or no supervision, security and/or regulation of the off-road vehicles. DEFENDANTS possessed actual and constructive awareness that accidents, including fatalities, involving off-road vehicles increased exponentially with the rapid influx of visitors, specifically in the area where the subject accident occurred. DEFENDANTS possessed actual and constructive awareness that they failed to have adequate safety rules and regulations for drivers of off-road vehicles. Defendants possessed actual and constructive awareness that they provided inadequate security and safety procedures that prevented adequate medical response time for persons in ISDRA.

1 17. The injuries suffered by Plaintiff were foreseeable.

2 18. DEFENDANTS, who possessed actual and constructive awareness of the  
3 dangers of the ISDRA, consciously, recklessly and negligently disregarded the dangers.  
4 The DEFENDANTS failed to exercise, limit or control the patrons of ISDRA and further  
5 failed to remedy the dangers of which they possessed actual and constructive knowledge.

6 19. As a direct and proximate result of the negligence, carelessness, recklessness,  
7 wanton disregard, maliciousness and unlawfulness of all DEFENDANTS, as aforesaid, Kyle  
8 Przysiecki suffered fatal injuries and VENUS ANGELIQUE HISAW suffered, and  
9 continues to suffer, from the loss of her son. Wherefore each Plaintiff has suffered more  
10 than \$5,000,000.00 in damages.

11 **VI.**

12 **SECOND CLAIM FOR RELIEF**

13 **(Premises Liability Against All Defendants, DOES 1-100, Inclusive)**

14 20. Plaintiffs hereby incorporate by this reference as if fully set forth herein, each  
15 and every allegation set forth in each and every averment of the preceding Paragraphs 1  
16 through 19 above of this Complaint.

17 21. DEFENDANTS, as owners of the premises, ISDRA, and through their agents,  
18 as hereinabove alleged, were negligent in that, among other things, they failed to exercise  
19 due care in the ownership, construction, operation, supervision, maintenance, and security of  
20 the premises to ensure that visitors were not subject to any unreasonable risk of harm when  
21 on the premises. Furthermore, the DEFENDANTS willfully and/or maliciously failed to  
22 guard or warn against a dangerous condition, use, structure or activity.

23 22. As a direct and proximate result of the negligence, carelessness, recklessness,  
24 wanton disregard, maliciousness and unlawfulness of all DEFENDANTS, as aforesaid, Kyle  
25 Przysiecki suffered fatal injuries and VENUS ANGELIQUE HISAW suffered, and  
26 continues to suffer from the loss of her son. Wherefore Plaintiff has suffered more than  
27 \$5,000,000.00 in damages.

28 ///



VII.

**THIRD CLAIM FOR RELIEF**

**(42 U.S.C. Section 1983 Deprivation of Civil Rights as Defendant United States, and  
DOES 21-70)**

23. Plaintiffs hereby incorporate by this reference as if fully set forth herein, each and every allegation set forth in each and every averment of the preceding Paragraphs 1 through 22 above of this Complaint.

24. This cause of action is brought pursuant to 42 U.S.C. §§1983 and 1988 for Defendants' violation of rights guaranteed Plaintiffs under the United States Constitution.

25. Defendants, and each of them, during all relevant times were State actors, acting under the color of law.

26. Defendants, and each of them, violated Plaintiffs' rights as provided under the Fourteenth Amendment to the United States Constitution.

27. Prior to and at the time of the subject accident Defendants knew that the ISDRA posed a substantially dangerous threat of death and great bodily harm to the public including Kyle Przysiecki.

28. With gross negligence, recklessness and deliberate indifference to the lives of the public, including Kyle Przysiecki, Defendants withdrew all police officers from the ISDRA on the date of the incident;

29. With gross negligence, reckless and deliberate indifference to life of Kyle Przysiecki, Defendants summoned only limited medical aide when they knew that an air medivac was able to arrive at the scene;

30. With gross negligence, reckless and deliberate indifference to life of Kyle Przysiecki, Defendants created and maintained inadequate rules and regulations for motorists that Defendants knew would result in accidents, deaths and great bodily harm.

31. Said actions by Defendants were a legal cause of the death of Kyle Przysiecki and the damages of the Plaintiff as alleged herein.

///

VIII.

**FOURTH CLAIM FOR RELIEF**

**(Wrongful Death as Against All Defendants, DOES 1-100, Inclusive)**

32. Plaintiff hereby incorporates by this reference as if fully set forth herein, each and every allegation set forth in each and every averment of the preceding Paragraphs 1 through 31 above of this Complaint.

42. On December 25, 2005 Kyle Przysiecki was injured and died as hereinabove described.

43. By reason of Kyle Przysiecki's death, and under the laws of the State of California set forth at California Code of Civil Procedure section 377.60, et seq.: Plaintiff VENUS ANGELIQUE HISAW is an heir at law and has suffered an action for the wrongful death and loss of a loving and kind son and would be entitled to the property of Kyle Przysiecki through intestate succession. As legal heir to decedent, VENUS ANGELIQUE HISAW hereby pursues all rights and remedies pursuant to California Code of Civil Procedure sections 377.60, 377.61, and 377.62, et. al.

X.

**PRAYER**

WHEREFORE, Plaintiffs pray for judgment as follows:

As to the First Claim for Relief:

1. For compensatory damages of \$5,000,000.00 (five million dollars) for VENUS ANGELIQUE HISAW;
2. For prejudgment interest;
3. For costs of suit; and
4. For such other and further relief as the Court deems just and proper.

As to the Second Claim for Relief:

1. For compensatory damages of \$5,000,000.00 (five million dollars) for VENUS ANGELIQUE HISAW;
2. For prejudgment interest;



3. For costs of suit; and

4. For such other and further relief as the Court deems just and proper.

As to the Third Claim for Relief:

1. For compensatory damages of \$5,000,000.00 (five million dollars) for  
VENUS ANGELIQUE HISAW;

2. For attorneys' fees, expert fees and expenses of litigation;

3. For prejudgment interest;

4. For costs of suit; and

5. For such other and further relief as the Court deems just and proper.

As to the Fourth Claim for Relief:

1. For compensatory damages of \$5,000,000.00 (five million dollars) for  
VENUS ANGELIQUE HISAW;

3. For prejudgment interest;

4. For costs of suit; and

5. For such other and further relief as the Court deems just and proper.

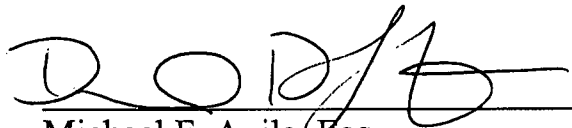
**XI.**

**JURY DEMAND**

Plaintiff hereby demands a trial by jury on all issues so triable pursuant to Fed. R.  
Civ. Proc. 38(b) and S.D. Cal. R. 38.1

Dated: June 30, 2008

**AVILA & PEROS, LLP**

By:   
Michael F. Avila, Esq.  
Daniel A. De Soto, Esq.  
Attorneys for Plaintiffs

**UNITED STATES  
DISTRICT COURT**  
SOUTHERN DISTRICT OF CALIFORNIA  
SAN DIEGO DIVISION

**# 152702 - TC**

**July 08, 2008  
09:43:39**

**Civ Fil Non-Pris**

USAO #: 08CV1214

Judge.: JEFFREY T MILLER

Amount.: \$350.00 CK

Check#: BC12954

**Total-> \$350.00**

FROM: VENUS ANGELIQUE HISAW

VS.

US DOES 1-100

JS 44 (Rev. 12/07)

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

## I. (a) PLAINTIFFS

VENUS ANGELIQUE HISAW

(b) County of Residence of First Listed Plaintiff Orange, California  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Daniel A. De Soto, Esq., Avila & Peros, LLP (310) 410-8001  
2101 Rosecrans Ave., Suite., 5260, El Segundo, California 90245

## DEFENDANTS

UNITED STATES, and De Soto, Daniel A.

County of Residence of First Listed Defendant: Orange, California  
(IN U.S. DISTRICT COURT CASES, USE THE LOCATION OF THE LAND INVOLVED.)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

08 CV 1214 JM BLM

FILED

JUL - 1 2008

CLERK U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
DEPUTY

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State ☐ 1 ☐ 1 Incorporated or Principal Place of Business In This State ☐ 4 ☐ 4
- Citizen of Another State ☐ 2 ☐ 2 Incorporated and Principal Place of Business In Another State ☐ 5 ☐ 5
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 Foreign Nation ☐ 6 ☐ 6

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Emp. Ret. Inc. Security Act	<b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
				<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

## V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
42 U.S.C. Sections 1981, 1983, 1985 and 1988, 28 U.S.C. Sections 2671-2680, 1331, 1332, 1346

Brief description of cause:  
Premises liability case involving U.S. owned property where fatal accident occurred.

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$  
\$ 20,000,000.00

CHECK YES only if demanded in complaint:  
 JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE Ruben B. BrooksDOCKET NUMBER 07CV0039-WQH

DATE

06/30/2008

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

152702

AMOUNT

4350

APPLYING IFP

JUDGE

MAG. JUDGE

KAC 7/8/08

CR